

Docket No.

In the United States Court of Appeals
for the Third Circuit

UNITED STATES OF AMERICA, Plaintiff-Appellee,

v.

JOSE TORRES, Defendant- Appellant.

**ANALYSIS OF PRO SE MOTIONS SUBMITTED TO THE DISTRICT COURT AND
REVIEWED BY THE SPECIAL MASTER AND ANALYSIS OF 11 ADDITIONAL
MOTIONS SUBMITTED TO THE COURT BY DEFENDANT**

DISTRICT COURT DOCKET NO.: 20-418-BRM

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**ANALYSIS OF PRO SE MOTIONS SUBMITTED TO THE DISTRICT COURT AND
REVIEWED BY THE SPECIAL MASTER:**

	DESCRIPTION OF MOTION	SEALED/R EDEDACTED	TOTAL NO. OF PAGES	TOTAL NO. OF MOTION PAGES	TOTAL NO. OF EXHIBITS PAGES	SUBMITTED BY
1	Bail motion base on “newly discovery” evidence (filing #1)	Sealed	92	44	48	Torres
2	Crime-Fraud exception motion (filing #7)	Seal	35	28	7	Torres
3	Motion for Reconsideration- conflict of interest based on “newly discovered evidence (filing #8)	Sealed	38	12	26	Torres
4	Motion to appointed special counsel to investigate issues of perjury, government and prosecutorial misconduct (filing #14)	Sealed	70	27	43	Torres
5	Supplemental motion regarding DOJ’s website “Ethics Handbook (filing #27)	Sealed	26	6	20	Torres

6	Motion to dismiss superceding indictment (filing #32)	Sealed	13	10	3	Torres
7	Motion to call AUSA Emma Spiro as a witness (filing #34)	Sealed	14	8	6	Torres
8	Motion to permit defendant to present arguments to jury- in limine (Filing #36)	Sealed	5	5	0	Torres
9	Torres's motions submitted to the Court (Filing #3)	With redactions	3	3	0	Status tracker-not a motion
10	Motions regarding 5 th and 6 th amendment violations (filing #4)	With redactions	11	11	0	Torres
11	Motions to be permitted to file additional motions as it become necessary (filing #5)	With redactions	2	2	0	Torres

12	Letter to AUSA Spiro regarding Attorney General's December 16, 2022 policy mandate (filing #6)	With redactions	2	2	0	Torres
13	Defendant's Motion for reconsideration regarding in-limine (filing #9)	With redaction	39	7	32	Torres
14	Defendant's Motion in opposition to memorandum of Government in support of motion for a filing of injunction (filing #10)	With redactions	8	4	4	Torres
15	Defendant's Motion requesting Court to required Government to make available early disclosure of Jencks Material (filing #11)	With redactions	5	4	1	Torres
16	Defendant's Motion for Sequestration (filing #16)	With redactions	3	3	0	Torres

17	Defendant reply to Government response re: pro se representation, shackling, limiting cross examination of victims (filing #19)	With redactions	5	5	0	Torres
18	Defendant response to Court's in limine decision (filing #21)	With redactions	17	17	0	Torres
19	Motions submitted to the Court-31 in Total (filing #30)	With redactions	4	4	0	Status Tracker - not a motion
20	Request for Brady Material (filing #2)	No redactions	3	3	0	Torres
21	Motion for daily transcripts (filing #12)	No redactions	3	3	0	Torres
22	Motion requesting internet access during trial (filing #13)	No redactions	2	2	0	Torres

23	Motion to prohibit the use of the term "victim" during trial to describe prostitutes (filing #15)	No redactions	2	2	0	Torres
24	Motion to vacate protective order to allow all defendant all discovery unredacted (filing 17)	No redactions	2	2	0	Torres
25	Torres will stipulate to any elements of the offenses (filing #18)	No redactions	2	2	0	Torres
26	Require Government to review personnel files of participating officers and disclose any information useful to defendant (filing #20)	No redactions	3	3	0	Torres
27	Motion to permit Defendant to participate in sidebar conferences (filing#22)	No redactions	2	2	0	

28	Motion to seal ex parte order for issuance of subpoenas and testificandum(filing #23)	No redactions	12	12	0	Submitted by Counsel David Schafer, Esq.
29	Motion to seal ex parte (filing #24)	No redactions	12	12	0	Submitted by Counsel David Schafer, Esq.
30	Permission to become familiar with Courtroom (filing #25)	No redactions	1	1	0	Torres
31	Requesting permission from the Court to be notified of any pro se motions not in compliance (filing #26)	No redactions	4	1	3	Torres
32	Requesting prostitution expert (filing #28)	No redactions	1	1	0	Torres
33	Motion to seal ex parte order for issuance of subpoena and testificandum (filing #29)	No redactions	10	10	0	Submitted by Counsel David Schafer, Esq.
34	Pretrial scheduling order regarding Rule 404(b) evidence (filing #31)	No redactions	9	3	6	Torres

35	Request for a second standby counsel (filing#33)	No redactions	1	1	0	Torres
36	Motion to admit “Reverse 404(b) evidence (filing #35)	No redactions	15	5	10	Torres
Total No. Of Pages			477	268	209	
Total No. of pages submitted by Defendant Jose Torres			436	227	209	

SUM:

Total No. of filings	36	
Filing submitted by Defense Counsel David Schaefer, Eq.		3
Trackers accidentally included in the filings		2
Filing by Defendant Jose Torres		31
Total		36
Averages	Pages per motion, excluding exhibits	7
	Pages per motion including exhibits	15

ANALYSIS OF 11 ADDITIONAL MOTIONS SUBMITTED TO THE COURT BY DEFENDANT

	DESCRIPTION	TOTAL NO. OF PAGES	TOTAL NO. OF MOTION PAGES	TOTAL NO. OF EXHIBIT PAGES	SUBMITTED BY:
37	Defendant objection to Government request to obtain Defendant's list of subpoenas	2	2	0	Torres
38	Request hearing re: Special Master's recommendation not to post certain of Defendant's motion on the public calendar	3	3	0	Torres
39	Motion to have access to a compute and mouse throughout the trial proceedings	2	2	0	Torres
40	Motion to preclude uncharged prostitutes from testifying (Motion in limine)	22	5	17	Torres
41	Response to Government's expert disclosures a requests for reciprocal discovery	26	5	21	Torres

42	Response to Frank Morano's motion to quash Torres' subpoena	10	3	7	Torres
43	Request for a data extraction interpreter	1	1	0	Torres
44	Request for approved international subpoenas to be sent to Carlos Torres	1	1	0	Torres
45	Request for private investigator in Canada	1	1	0	Torres
46	Response to Bruce Keller's Motion	7	3	4	Torres
47	Letter requesting a social security number or the equivalent or passport information for Count 2 of the superceding indictment	1	1	0	Torres
	TOTAL NO. OF PAGES SUBMITTED BY DEFENDANT	76	27	49	

SUMMARY AS TO 11 ADDITIONAL MOTIONS:

11 additional motions filed by Defendant, for a total of 47 motions

Average of 2 pages per motion, excluding exhibits

Average of 4 pages per motion including exhibits

Average of 6 pages per motion including exhibits

SUMMARY AS TO ALL MOTIONS

42 total motions filed by Defendant

Average of 6 pages per motion, excluding exhibits

Average of 12 pages per motion, including exhibits